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March 19, 1998

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Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: **Bellsouth Entry into Long Distance (InterLata) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996**
Docket No. 97-00309

Dear Mr. Waddell:

I enclose for filing one original and thirteen copies of the pre-filed testimony of Harry E. Swaim of the Communications Workers of America, AFL-CIO in the above-referenced case. I have enclosed an additional copy of his pre-filed testimony which I would appreciate your marking filed and returning to me in the self-addressed envelope. Copies are being served on all parties of record.

If you have any questions, please give me a call.

Sincerely yours,

Donald L. Scholes

DONALD L. SCHOLES

Enclosure

c: Parties of Record
John L. Quinn

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

In Re: *BellSouth Telecommunications, Inc.'s Entry Into Long
Distance (InterLATA) Service in Tennessee Pursuant
to Section 271 of the Telecommunications Act of 1996*

Docket No. 97-00309

PREFILED TESTIMONY

REC'D TN
REGULATORY AUTH.
98 MAR 20 PM 10 44
OFFICE OF THE
EXECUTIVE SECRETARY

Comes now the Intervenor, COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO, by and through undersigned, and in response to the petition filed by BELLSOUTH TELECOMMUNICATIONS, INC., in this case, hereby files the direct testimony of its representative, Harry E. Swaim.

Upon his oath, Mr. Swaim deposes and states as follows:

Q. Please state your name, business address and occupation.

A. My name is Harry E. Swaim. My business address is Communications Workers of America (CWA), 3354 Perimeter Hill Drive, Suite #220, Nashville, Tennessee 37211. I am a CWA Representative for the

Communications Workers of America, AFL-CIO, of the State of Tennessee and serve thirteen (13) local CWA unions throughout the State with a membership of over six (6,000) thousand.

Q. Please briefly describe your employment experience.

A. I am a retired Lucent Technologies employee with over thirty (30) years service. I served as Vice President and President of CWA Local Union 3806. Since 1975, I have served as CWA Representative, State of Tennessee, for a total of twelve (12) years.

Q. Please briefly describe your duties and responsibilities as CWA Representative for the State of Tennessee.

A. As CWA Representative, I am responsible for handling 3rd level grievances and arbitrations pursuant to various Collective Bargaining Agreements on behalf of CWA throughout the State of Tennessee. This includes arbitration and negotiation responsibilities under the various contracts, not only with BellSouth, but with AT&T, Highland Telephone Coop., Twin Lakes Coop., and North Central Coop., and others, as well.

Q. Please state the interest of the Communications Workers of America, AFL-CIO, in this proceeding.

A. The Communications Workers of America (CWA), AFL-CIO, represents

more than 6,000 employees in Tennessee in telecommunications, as well as other private and public sector employees.

The CWA has been involved in and interested in the passage and implementation of the Telecommunications Act of 1996 and in the Federal Communications Commission rulemaking process. CWA wants to ensure that proposed rules and regulations impose no negative impact on universal service, on service quality, or on employment opportunities. The key employment issues for CWA are job security, employment, growth, and quality of work.

Q. What are CWA's key principles which guide CWA's assessment of telecommunications policy?

A. CWA's four (4) key principles are: (1) to promote the growth of good paying, high skilled union jobs so that CWA members can grow with the industry; (2) to preserve and enhance quality universal service; (3) to promote network investment to expand access and quality services; and, (4) to secure competitive neutrality so that no union employers are disadvantaged and so that incumbent local exchange carriers are not handicapped by virtue of their responsibility to provide universal services.

(1) CWA advocates policies that promote competition based upon

technological efficiency, new and enhanced service offerings, and superior quality. The Union strongly believes that a competitive price edge should not be built upon low wages or abuse of labor law. No company should be disadvantaged because union workers have raised their living standards through collective bargaining. In addition, no company should be advantaged because it fights workers' efforts to organize a union.

(2) CWA believes that competition must promote quality, universal service. The Act's list of universal service principles begins with the concept that "quality" services should be available at "affordable" rates. CWA is especially supportive of the provision of the Telecommunications Act that guarantees schools, libraries, and rural health providers access to advanced telecommunications, and internet services at discounted rates. This will create new paths to the education and training needs for high-skill jobs — the foundation of better living standards in the future.

(3) CWA also believes that if the goals of the Act — lower prices, expanded access to advanced services, and job growth — are to be achieved, then policies which introduce competition into the local telephone market must encourage investment in networks, facilities and

equipment. Although the Act permits resale of local exchange carrier service, true economic growth will come about only if there is growth of facilities-based providers. Therefore, CWA supports policies that provide incentive to invest and to create jobs in the new competitive telecommunications industry.

(4) Because CWA represents workers in all areas of telecommunications, the Union advocates policies that assure a level playing field for union employers in the new competitive marketplace.

As the FCC and the Tennessee Regulatory Authority implement new rules for telecommunications competition, CWA holds that no union company should be disadvantaged. CWA advocates competitive neutrality to assure that no entity achieves competitive advantage by artificially suppressing costs. CWA believes that this policy promotes the Act's goal of creating good jobs in the telecommunications industry.

Q. What are the CWA's concerns with BellSouth's petition?

A. As the basis of this intervention, the Communications Workers of America (CWA) is concerned with BellSouth's compliance with the fourteen (14) point competitive checklist as found in Section 271(c)(2)(B) of the Telecommunications Act of 1996 [47 U.S.C.A., Sec. 271(c)(2)(B)],

as the failure of BellSouth to fully comply would have the potential to adversely affect the public as well as those we represent who are employed by BellSouth and other telecommunications companies.

We are also concerned that the revenue derived from this long distance service might not adequately cover the costs of providing it with the adverse potential that the work force we represent would be substantially reduced and the quality of service to the public would be substantially diminished.

CWA believes that the Regulatory Authority should analyze the impact that the grant of the BellSouth's Petition will have upon the people and employees of the State of Tennessee.

We also believe that CWA has information which will provide insight into the issues surrounding BellSouth's compliance with the competitive checklist found in Section 271 of the Telecommunications Act of 1996.

Finally, CWA is concerned that the BellSouth Petition will result in loss of employment for CWA members in Tennessee. BellSouth has been downsizing over the last several years, and is currently downsizing to the extent that over 100 or more jobs will be lost during the remainder of this year. At the same time, the BellSouth Petition, if granted, could result in

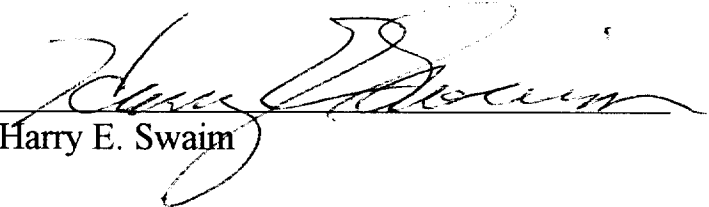
the loss of employment for CWA members who are employed by AT&T throughout the State of Tennessee.

Q. Do you wish to make any closing remarks?

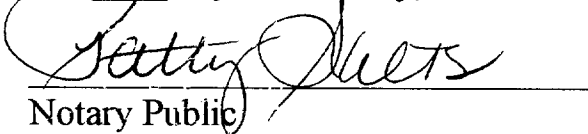
A. CWA believes that a well-trained, well-paid workforce occurs most often in a carrier involved in Collective Bargaining and with a union contract. CWA believes that the current Petition does not comply with the fourteen (14) point competitive checklist mandated by the Act and will have an adverse impact upon CWA employees within the State of Tennessee.

Q. Does this conclude your testimony?

A. Yes, it does, thank you.


Harry E. Swain

Sworn to and subscribed before me,
this 18 day of February, 1998.


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the parties of record via U. S. Mail, postage prepaid, this 19th day of March, 1998, addressed as follows:

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